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BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268–0001

SPECIAL STUDY ON ISSUES RELATED TO FLATS OPERATIONS	Docket No. SS2022-1

RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO QUESTIONS 1-8 OF CHAIRMAN'S INFORMATION REQUEST NO. 1
(August 16, 2022)

The United States Postal Service hereby provides its responses to the above listed questions of Chairman's Information Request No. 1, issued August 9, 2022. The questions are stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorney:

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August 16, 2022

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO CHAIRMAN'S INFORMATION REQUEST NO. 1

1. Please refer to Docket No. ACR2021, Library Reference USPS-FY21-NP31, December 29, 2021, Zip file "USPS-FY21-NP31.zip," folder "Rule 3050.50 Flats," folder "Paragraph (e) -- Pinch Point Nonpublic Reports," folder "e.6 Surface Visibility," Excel file "SV.Req.Scans.FY17_FY21.NonPublic.xlsx."

a. Please describe in detail the types of scans and the methodology for calculating the scans data included in the column "Expected" of each fiscal year workbook tab of the referenced file.

b. Please describe in detail the types of scans and methodology for calculating the scans data included in the column "Performed" of each fiscal year workbook tab of the referenced file.

c. Please confirm that in multiple tabs of the referenced file, the difference between the number of scans in the relevant cells of "Expected" and "Performed" columns equals the number of not performed scans. If not confirmed, please explain how the number of not performed scans can be calculated.

d. If question 1.c. is confirmed, please list the most common types of not performed scans that cause the scan compliance scores to be less than 100 percent, and explain why such scans were not performed. If the major types of such scans differ by fiscal year, please provide separate lists and explanations by fiscal year.

e. Please confirm that the scan data included in the referenced file represent scans only associated with Highway Contract Route (HCR) transportation and do not include scans associated with the Postal Vehicle Service (PVS) drivers, and/or any other type of transportation service.

   i. If not confirmed, please list all transportation for which the Postal Service provides scan data in the referenced file.

   ii. If confirmed, please explain whether the provided scan data include inter- and/or intra-Sectional Center Facility (SCF) transportation, inter- and/or intra-Network Distribution Center (NDC) transportation, for each category of HCR transportation (such as regular, emergency, extra, Christmas, and/or any other).

RESPONSE:

a. Expected scans for Assign, Close, Load, and Unload are generated for SV sites when a scan is performed on the container placard, with the expected site

determined based on the placard's Origin and Destination information from MTEL (which is the source system of container placard information).

- Assign is the first scan for a container which indicates a container is open for building/nesting of contents via mail processing operations. Expected Assign scans are based on the sum of all Assign, Close, Load and Unload scans for the facilities listed on the placard.
- Close indicates building/nesting of the container is complete. Expected Close scans are based on the sum of all Assign, Close, Load and Unload scans for the facilities listed on the placard.
- Load indicates a container has been loaded into a PVS or HCR trailer in preparation for trip departure from an origin facility. Expected Load scans are based on the sum of all Assign, Close, Load and Unload scans for the facilities listed on the placard.
- Unload indicates a container has been unloaded from a PVS or HCR trailer after a trip arrives as its destination. An Expected Unload scan at the final destination is only generated once the Load scan has been performed by the upstream site.
- The following scans are expected once any scan is performed on a placard (see below):

Facility Type	Assign	Close	Load	Unload
Originating	Yes	Yes	Yes	No
Destinating	No	No	No	Yes
Via Site/Hub	No	No	Yes	Yes

Expected scans for Arrive and Depart are generated for SV sites based on scheduled (not canceled/omitted) trips.

- Arrive indicates transportation has arrived at a facility.
- Depart indicates transportation is departing a facility.
- The following scans are expected based on transportation (see below):

Facility Type	Trailer Arrive	Trailer Depart
Origin	No	Yes
Via/Hub	Yes	Yes
Destination	Yes	No

b. Performed scans are generated when a user or a machine at SV site performs the required Assign, Close, Load, Depart, Unload or Arrive scans.

c. The difference between Expected and Performed scans are considered Missed scans, and not "not performed scans." Missed scans can be due to schedule changes such that the mail or trailer no longer reaches the originally expected destination, so the scans are missed. Other examples might be that the user scanned an incorrect barcode, failed to perform scans, or experienced a device issue and therefore could not perform a scan.

d. Please refer to the response above in section c.

e. The scan data includes scans associated with HCR, PVS, and Rail transportation and containers not associated with any transportation information. SV Scan Compliance evaluates scans performed at SV sites regardless of the transportation service type. Also, not all container scans will have transportation associated.

    i. All HCR, PVS, Rail, and no transportation (users can perform Load and Unload scans to trailers without association to trips)

    ii. Please refer to response above in section i.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO CHAIRMAN'S INFORMATION REQUEST NO. 1

2. Please refer to Docket No. ACR2021, Library Reference USPS-FY21-NP31, Zip file "USPS-FY21-NP31.zip," folder "Rule 3050.50 Flats," folder "Paragraph (e) -- Pinch Point Nonpublic Reports," folder "e.6 Surface Visibility," Excel file "NonPublic SV Data_FY17_FY21.xlsx."

a. Please confirm that in the tabs "Ontime Departure," and "Ontime Arrival" of the referenced file the Postal Service calculates on-time departure percentages for trucks, for which both departure and arrival time scans were performed. If not confirmed, please explain.

b. Please confirm that in the tab "Load Percentage" of the referenced file the Postal Service calculates load percentages for the combined arriving and departing trucks for which applicable scans were performed.

i. If not confirmed, please explain.

ii. If confirmed, please explain which scans the Postal Service uses to determine the truck floor area.

iii. If confirmed, please also explain which scans the Postal Service uses to determine the truck floor area taken up by mail transport containers.

c. Please explain the numerator and the denominator values used to calculate load percentages in the tab "Load Percentage."

d. For each container type shown in the tab "Utilization by Ctr" of the referenced file, please explain how the space utilization percentage is calculated. In your response, please also include a description of the numerator and denominator used to calculate the space utilization percentage for each container type.

RESPONSE:

a. Confirmed.

b. Not confirmed.

i. Load Percentage is calculated for containers Load scanned onto trucks departing SV facilities. Load scan captures the trailer barcode and placard barcode information.

ii. Please refer to response above in section i.

iii. Please refer to response above in section i.

c. The denominator is the trailer floor square footage. This information comes from SEAM or is entered by users upon trailer installation on SVmobile or SVweb. The numerator is the sum of the container base square footage of all containers Load scanned to the trailer. The container size is determined upon Assign scan and defaults to a pallet if an Assign scan is missed.

d. Space utilization is calculated based on the numerator (which is the sum of load percent for the container type) over the denominator (which is the number of containers for the container type). Please refer to response above in section c for logic on load percent. See example in the table below for two trips where each trailer was 53ft in length and 26ft in length:

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO CHAIRMAN'S INFORMATION REQUEST NO. 1

Container Type	Sq Ft Amount	Count	53ft Trailer Sq Ft Amount	Load %	Count	26ft Trailer Sq Ft Amount	Load %	Sum Load %	Sum Load Count	Space Utilization
0112 Rigid Wire Container With Wheels	18.77	1	450.5	4.2%	2	208	18.0%	22.2%	3	7.4%
1033 Hamper	7.23	2	450.5	3.2%	3	208	10.4%	13.6%	5	2.7%
3910 Bulk Mail Container Over The Road - Heavy Duty	22.53	3	450.5	15.0%	4	208	43.3%	58.3%	7	8.3%
3921 Eastern Regional Mail Container	10.73	4	450.5	9.5%	5	208	25.8%	35.3%	9	3.9%
FSS CASTR	7.56	5	450.5	8.4%	6	208	21.8%	30.2%	11	2.7%
GAYLORD 4FT	17.33	6	450.5	23.1%	7	208	58.3%	81.4%	13	6.3%
3910 Bulk Mail Container Over The Road - Light Duty	10.73	7	450.5	16.7%	8	208	41.3%	57.9%	15	3.9%
FSS Dolly	9	8	450.5	16.0%	9	208	38.9%	54.9%	17	3.2%
PALLET	17.33	9	450.5	34.6%	10	208	83.3%	117.9%	19	6.2%
FSS Tray	1.96	10	450.5	4.4%	11	208	10.4%	14.7%	21	0.7%
Universal Mail Container	10.73	11	450.5	26.2%	12	208	61.9%	88.1%	23	3.8%

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO CHAIRMAN'S INFORMATION REQUEST NO. 1

3. Please refer to Docket No. ACR2021, Library Reference USPS-FY21-NP31, Zip file "USPS-FY21-NP31.zip," folder "Rule 3050.50 Flats," folder "Paragraph (e) -- Pinch Point Nonpublic Reports," folder "e.6 Surface Visibility," Excel file "NonPublic NPA_Trips on Time Data_FY17_FY21.vh2.xlsx."

a. Please refer to tabs that include Surface Visibility National Performance Assessment Scores (SV NPA Score) for FY 2017 through FY 2021.[1] Please explain in detail how facility-specific SV NPA Scores included in the referenced tabs are calculated and what facility-specific input data are used in the calculation.

b. Please refer to the tabs that include facility-specific data for trips on time.[2]

   i. Please explain in detail how values for "Trips on Time Rate" are calculated and what facility-specific input data are used in the calculations.

   ii. Please explain in detail how values for "Trips on Time % Extra Trips" are calculated and what facility-specific input data are used in the calculations.

   iii. Please explain the difference between the "Trips on Time Rate" and "Trips on Time % Extra Trips" scores.

   iv. Please explain in detail how values for "Trips on Time Avg" are calculated and what facility-specific input data are used in the calculations.

c. Please explain the difference between SV NPA Score and each of the trips-on-time indicators referenced in question 3.b. ("Trips on Time Rate," "Trips on Time % Extra Trips," and "Trips on Time Avg").

d. Please explain the difference in the number of facilities for which the Postal Service provides SV NPA Scores and the number of facilities for which it provides trips-on-time scores.[3]

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[1] *See* tabs "FY21 SV NPA Data," "FY20 SV NPA Data," "FY19 SV NPA Data," "FY18 SV NPA Data," and "FY17 SV NPA Data."

[2] *See* tabs "FY21 TOT," "FY20 TOT," "FY19 TOT," and "FY18 TOT."

[3] *E.g.*, for FY 2021, the Postal Service provides SV NPA Scores for 376 facilities (*see* tab "FY21 SV NPA Data") and it provides Trips-on-Time scores for 284 facilities (*see* tab "FY21 TOT").

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO CHAIRMAN'S INFORMATION REQUEST NO. 1

RESPONSE:

a. Trips On Time NPA indicator is a measurement of on time performance rate of Actual Departures to Scheduled Departures for HCR/PVS transportation that are outbound to all locations departing selected NPA sites. Specific MTESC transportation routes, Christmas extra transportation (including Go-Anywhere trips), Air to Surface Diversion transportation, and Ramp Clerk Trips are excluded.

b.

i. For each site listed in section above, the "Trips On Time Rate" was calculated for outbound HCR/PVS trips (Early Trips + On Time Trips – Manually Edited Trips) / (Total Scheduled Trips – Cancelled Trips). NDC sites receives a 20-minute grace time for Trips on Time. Please refer to response above in section a for detailed NPA logic with site list and exclusions.

ii. For each site listed in section above "Trips On Time % Extra Trips" was calculated for outbound HCR/PVS trips (Extra Trips / (Total Scheduled Trips – Cancelled Trips)

iii. Please refer to response above in section i. for "Trips On Time Rate" and section ii. For "Trips On Time % Extra Trips"

iv. "Trips On Time Avg" was not provided in FY 2021. Note that "Trips On Time Avg" entries in prior years were merely a reflection of how the

average of the NPA cell values for the two scores for the facility converted to one NPA cell value, based on NPA targets. Without NPA targets, there is neither an ability nor a need to identify a "Trips on Time Avg" entry. Please see the note in row 288 in the FY21 TOT tab.

c. SV NPA score is the same as SV Scan Compliance NPA reported in the SV.Req.Scans.FY17_FY21.NonPublic.xlsx file. "Trips On Time Rate" is FY21 NPA Trips On Time Score. "Trips On Time % Extra Trips" is percent of trips that were extra for NPA Trips On Time score denominator. With regard to "Trips On Time Avg," please see the response provided above to question 3.b.iv.

d. In FY 2021, there were 376 facilities activated with SV and 284 facilities identified by Transportation and the NPA team to report on NPA Trips on Time score. Logistics Operations determines the sites included for each measure. For the most part, all Trips on Time sites are SV sites. However, some SV sites are excluded from Trips on Time measures. Some of these include non-Postal sites, select annexes, and DU hubs.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO CHAIRMAN'S INFORMATION REQUEST NO. 1

4. For all transportation hubs, such as surface transfer centers (STCs) that include flats mail flows, please provide the following information. If any of the requested information is not available for any individual facility or group of facilities, please explain why this information is unavailable.

a. Finance Number

b. Facility ID

c. Surface Visibility site ID (if different from Facility ID requested in question 4.b.)

d. Facility physical address including the 5-digit ZIP Code

e. Geographical coordinates identifying the location for each facility (latitude and longitude)

f. Operation types performed at this facility, including cross-dock, any sortation or rerouting

g. Interior square footage

RESPONSE:

a.-g. Please see tab STCs in the Excel file associated with this response in the zip file attached to this response set electronically. However, the public version in the attached zip file excludes the commercially-sensitive geographical coordinates requested in subpart e and the interior square footage data requested in subpart g, which are instead provided under seal in the nonpublic version submitted as part of USPS-SS2022-1-NP1.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO CHAIRMAN'S INFORMATION REQUEST NO. 1

5. Please refer to Docket No. ACR2021, Library Reference USPS-FY21-NP31, Zip file "USPS-FY21-NP31.zip," folder "Rule 3050.50 Flats," folder "Paragraph (e) -- Pinch Point Nonpublic Reports," folder "e.2 Mail Processing Variance," Excel file "NONPUBLIC MP Variance FY17_21.xlsb."

a. Please discuss whether the Postal Service is considering setting new, more achievable productivity targets. If not, please explain why.

b. Please confirm that the referenced Excel file was developed using the Management Operating System (MODS) data from Docket No. ACR2021, Library Reference USPS-FY21-NP18, December 29, 2021. If not confirmed, please list the source data.

c. If question 5.b. is confirmed, please describe all the steps involved in moving from the MODS data to the finished Excel file "NONPUBLIC MP Variance FY17_21.xlsb." If applicable, please provide a SAS or other program showing the file development process, and calculation steps. In your response, please include for each mail processing category group, the MODS operation codes[4] used to aggregate to the mail processing category group.

d. Please specify and describe for each mail processing category group in Excel file "NONPUBLIC MP Variance FY17_21.xlsb," all the differences in the calculations, aggregation, and screening procedures between the mail processing productivities in Docket No. ACR2021, Library Reference USPS-FY21-23, Excel file "YRscrub2021.xlsx."[5]

RESPONSE:

a. The Postal Service continues to evaluate productivity measures based on changing mail mix and relative workload. Targets are reviewed periodically in conjunction with operations.

[4] "MODS operations, represented by a 3-digit number, are provided for recording all work hours in Postal Service facilities according to function or activity performed." *See* Docket No. ACR2021, Library Reference USPS-FY21-7, PDF file "M-32 MODS Handbook.pdf," Section A-1 at 113.

[5] Docket No. ACR2021, Library Reference USPS-FY21-23, December 29, 2021, Excel file "YRscrub2021.xlsx."

b. Not confirmed. MODS data are the source for the above referenced file "NONPUBLIC MP Variance FY17_21.xlsb." However, the MODS data used for MP Variance were not directly sourced from the file provided in Docket No. ACR2021, USPS-FY21-NP18.

c. The Postal Service uses different software applications and methods to analyze each mail processing group. This involves different calculations depending on the operations, time frame requested, and/or any comparison to prior years. The relevant MODS operations codes are listed below.

AFSM – AI - 461,462,463,464,465,466,467
AFSM – ATHS - 401,402,403,404,405,406,407
AFSM - AI/ATHS - 141,142,143,144,145,146,147
FSS - 538
AFSM – 100 - 194,331,332,333,334,335,336,337
FSM 1000 - 305,446,450,451
FPARS - 501,503,505,506,508,509,801,803,805,806,808,809
Other Volume/Hrs - LDC 12 operations not listed above (if any)
Manual Flat - 060,062,070,073,074,170,175,178,179,800

d. The Excel workbook ChIR1_Q5d.xlsx, included in the zip file attached to this response, provides a crosswalk of the MODS operation codes by mail processing group listed in the response to part (c), above, with the operation groups reported in

the referenced "YRscrub2021.xlsx" file from Docket No. ACR2021, USPS-FY21-23. USPS-FY21-23 includes a description of processing methods and computer code used to produce "YRscrub2021.xlsx."

Differences in processing for the USPS-FY21-23 data and the "NONPUBLIC MP Variance FY17_21.xlsb" ("MP Variance") file include:

- USPS-FY21-23 reports national aggregate productivities for use in cost models provided in the ACR, using Commission-accepted methods
- The USPS-FY21-23 calculations screen observations in the outer tails of the productivity distributions for each reported group prior to aggregation
- The USPS-FY21-23 productivities generally are disaggregated by scheme in addition to the equipment types reported in the MP Variance file
- The MODS data used in USPS-FY21-23 (provided in Docket No. ACR2021, USPS-FY21-NP18) are acquired independently of the MODS data used in the MP Variance file
- There is no accepted productivity calculation for FPARS operations, thus no FPARS productivity is reported in USPS-FY21-23 and FPARS operations are not included in USPS-FY21-23 operation groups

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO CHAIRMAN'S INFORMATION REQUEST NO. 1

- The accepted productivity calculation for FSS operations in USPS-FY21-23 is inclusive of workhours in MODS operation 530, which is not included in the MP Variance file's FSS group
- The accepted productivity calculations in USPS-FY21-23 exclude several operations for processing International Mail that are included in certain MP Variance operation groups

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO CHAIRMAN'S INFORMATION REQUEST NO. 1

6. For all mail processing facilities that process flat-shaped mail and not included in the response to question 4., please provide the following information. If any of the requested information is not available for any individual facility or group of facilities, please explain why this information is unavailable.

a. Finance Number

b. Facility ID

c. Surface Visibility site ID, if different from Facility ID requested in question 6.b.

d. Facility physical address including the 5-digit ZIP Code

e. Geographical coordinates identifying the location of each facility (latitude and longitude)

f. National Air and Surface System (NASS) facility type

g. Interior square footage

RESPONSE:

a.-g. Please see tab Flats Processing in the Excel file associated with this response in the zip file attached to this response set electronically. However, the public version in the attached zip file excludes the commercially-sensitive geographical coordinates requested in subpart e and the interior square footage data requested in subpart g, which are instead provided under seal in the nonpublic version submitted as part of USPS-SS2022-1-NP1.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO CHAIRMAN'S INFORMATION REQUEST NO. 1

7. For all destination delivery units (DDUs), please provide the following information. If any of the requested information is not available for an individual facility or group of facilities, please explain why this information is unavailable.

a. Finance Number

b. Facility name

c. Facility ID

d. Surface Visibility Site ID (if different from the Facility ID requested in question 7.c.)

e. Dropship address including the 5-digit ZIP Code

f. 5-digit ZIP Codes serviced by this DDU

g. Dropship geographical coordinates (longitude and latitude)

h. Count of City Routes and Rural Routes associated with the DDU

i. Identification of process & distribution centers (P&DCs) that service each DDU

j. Identification of network distribution centers (NDCs) that service each P&DC

k. Identification of all DDUs that are serviced by Flats Sequencing System (FSS) machines

RESPONSE:

a. – i., k. Please see the Excel file associated with these subparts of the response in the zip file attached to this response set electronically. However, the public version in the attached zip file excludes the commercially-sensitive geographical coordinates requested in subpart g, which are instead provided under seal in the nonpublic version submitted as part of USPS-SS2022-1-NP1.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO CHAIRMAN'S INFORMATION REQUEST NO. 1

j. Please see tab Flats Processing in the Excel file associated with this subpart of the response in the zip file attached to this response set electronically.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO CHAIRMAN'S INFORMATION REQUEST NO. 1

8. Please refer to Docket No. ACR2021, Library Reference USPS-FY21-NP31, Zip file "USPS-FY21-NP31.zip," folder "Rule 3050.50 Flats," folder "Paragraph (e) -- Pinch Point Nonpublic Reports," folder "e.1 Bundle Breakage Visibility," Excel file "FY17_FY21.Bundle.Brkge.E1_NonPublic.xlsx (Bundle Breakage Dataset)."

a. Please confirm there are fewer unique facilities listed in the Bundle Breakage Dataset compared to Library Reference USPS-FY21-NP31, Excel file "NONPUBLIC MP Variance FY17_21.xlsb."

b. If question 8.a. is confirmed, please explain why there are fewer facilities included in the Bundle Breakage Dataset.

c. Please discuss whether, in addition to the Bundle Breakage Dataset, there is any facility-level data that includes flats costs or flat volumes of collection and preparation activities.

RESPONSE:

a. Confirmed.

b. The NONPUBLIC MP Variance FY17_21.xlsb" file contains facilities where individual flats pieces are processed on sorting equipment or in manual operations. The Bundle Breakage Dataset contains only facilities where full-service bundles are processed on automation and receive a first scan on bundle sorting machines. The facility counts will not match as the parameters used to generate the datasets are different.

c. The intended scope of the phrase "facility-level data that includes flats costs or flat volumes of collection and preparation activities" is not entirely clear. There are, however, two categories of MODS data that potentially

might fall within the scope. The more important category would include data on flat mail prep operations (MODS operations 035, 036, 140, and 530) for, respectively, AFSM 100 (non-AI), FPARS, AFSM 100 AI, and FSS processing. Another (probably less important) category includes data on flat cancellation (009 flat hand cancellations and 016 flat machine cancellations). Data for both categories are available by finance number in the MODS datasets provided in ACR folder NP18 (e.g., USPS-FY21-NP18). The MODS Handbook M-32 Appendix A documents, also provided in the ACR folders (public 7 and NP18), would describe the activities and methodology for workload measures.

Beyond that, the Postal Service has not identified any further facility-level data that appear to include flats costs or flat volumes of collection and preparation activities.